

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

FIRST FED BANK, a Washington state  
commercial bank,

**NO. 3:24-CV-5730-TL**

Plaintiff

V.

INDIANA WATER TECHNOLOGY LLC, an Indiana Limited Liability Company, David A. Schroeder, an individual, and Sarah Schroeder, an individual,

## Defendants

INDIANA WATER TECHNOLOGY LLC, an Indiana Limited Liability Company, David A. Schroeder, an individual, and Sarah Schroeder, an individual.

### Counterclaim Plaintiffs.

V.

## FIRST FED BANK.

### Counterclaim Defendant.

INDIANA WATER TECHNOLOGY LLC, an Indiana Limited Liability Company, David A. Schroeder, an individual, and Sarah Schroeder, an individual.

### Third Party Plaintiffs,

V.

FIRST NORTHWEST BANCORP,  
NORMAN TONINA, CRAIG CURTIS,  
JENNIFER ZACCARDO, CINDY FINNIE,  
DANA BEHAR, MATTHEW DEINES,  
SHERILYN ANDERSON, GABRIEL  
GALANDA, LYNN TERWOERDS, JOHN  
DOES 1-10,

### Third Party Defendants.

TO: Clerk of the Court; and

TO: All Parties and their Attorneys of Record

Pursuant to Fed. R. Civ. P. 38, and Fed. R. Civ. P. 81(c)(3), Defendants and Third-Party Plaintiffs hereby demand that all issues raised in the above-captioned action be tried before a 12-member jury.

DATED this November 13, 2024.

K&L GATES LLP

s/John T. Bender

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3 *Counsel for Defendants, Counterclaim*  
4 *Plaintiffs, and Third-Party Plaintiffs*  
5 *David A. Schroeder, and Sarah Schroeder*

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**CERTIFICATE OF SERVICE**

I, Suzanne M. Petersen, declare as follows:

I certify under penalty of perjury under the laws of the state of Washington that on November 13, 2024, a true and correct copy of the foregoing document was sent for service on the following persons as indicated below via ECF and electronic mail:

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*Attorneys for Plaintiff*

DATED November 13, 2024 in Seattle, Washington.

*/s/ Suzanne M. Petersen*  
Suzanne M. Petersen  
Legal Assistant

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